

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6360 CR-DIMITROULEAS

UNITED STATES OF AMERICA

Plaintiff,

vs.

PABLO ANAYA

et. al.,

Defendant.

**MOTION FOR EXTENSION OF TIME WITHIN WHICH TO FILE
OBJECTIONS TO PRE-SENTENCE INVESTIGATION REPORT**

The Defendant PABLO ANAYA hereby moves this Honorable Court for an order extending the time within which to file objections to the Pre-Sentence Investigation report from June 18, 2001 until June 25, 2001, and as grounds therefore state:

1. The undersigned received the pre-sentence investigation report in an untimely fashion.
2. The Defendant is greatly concerned about his criminal history. In response to the undersigned has requested, through an investigator, copies of the various state files which were scored as criminal history including the cases in Marathon (fish and game violations), and the cases in Dade County.
3. The undersign does not yet have copies of the appropriate state case files as of the date of the filing of this motion and may not have same in time to file the response when due on June 18, 2001.

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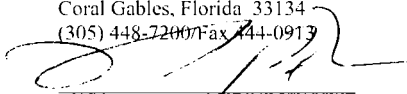
4. In an abundance of caution therefore the undersigned is requesting this one week extension.

WHEREFORE the Defendant requests that this Court grants this motion and enter an order granting the extension as requested.

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the Clerk of the United States District Court, 299 E. Broward Blvd., Ft. Lauderdale, Fl. 33301, AUSA Donald F. Chase, II, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, Fl. 33394, and to Julia Hyle, 300 N.E. 1st Avenue, Suite 315, Miami, Florida 33132 on this 14 day of June 2001.

I FURTHER CERTIFY that I attempted to contact AUSA Chase to ascertain his position hereon, but that I was unable to contact him prior to the filing of this motion.

DeFabio & Fenn, P.A.
Attorney for Defendant.
Pablo Anaya
2121 Ponce de Leon Boulevard, S-430
Coral Gables, Florida 33134
(305) 448-7200 Fax 444-0913



LEONARD P. FENN, ESQUIRE
F.B.N. 237337